

1833 RF 93

DUE
DATE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

ACTION

DIST.	LTR	ENC
BENEDETTI, R.L.	<input checked="" type="checkbox"/>	
BENJAMIN, A.		
BERMAN, H.S.		
CARNIVAL, G.J.		
COPP, R.D.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
MANN, H.P.		
MARX, G.E.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
RILEY, J.H.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
SHEPLER, R.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		
ZANE, J.O.		

Taylor KIX

CORRES CONTROL x x

Reviewed for Addressee
Corres. Control RFP4-21-93
DATE

BY

Ref Ltr. #

APR 13 1993

Ref: 8HWM-FF

Mr. Richard Schassburger
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

re: OU 2 Draft Tech Memo #8

Dear Mr. Schassburger:

EPA has completed review of the referenced document. Our comments and those prepared by our technical review contractor are included below. In general, the issues raised involve clarification of particular aspects of the plan and the procedure established to identify and execute contingencies if assumed conditions do not hold true. The basic approach outlined in the revised flow diagrams you submitted after our March 31, 1993, meeting are acceptable, with the exception that inability to develop a well says nothing about exposure pathways; it simply means no viable sample can be obtained from that location. The investigation must then be terminated or a contingency activated. We encourage you to proceed with the field program outlined using this logic to guide field decisions.

I would like to reiterate two points made at our meeting. First, the existence or absence of risk as calculated using exposure pathways is not the sole factor in determining the need for action. ARARs are still a consideration. The logic used to guide the investigation cannot therefore be based entirely on the perceived need to support a quantitative risk assessment for the lower HSU. Second, the ability of the lower HSU to support domestic water use is not relevant to the decisions being made at this stage of the process. If lower HSU contamination is identified, contrary to assumed conditions, the quantity question can be dealt with in the design of contingent actions. Lateral extent of contamination may be an issue, regardless of the aquifer's ability to supply domestic users. Numerous portions of the text will require revision to reflect these points, and to be consistent with the revised flow diagrams.

Further, it must be made absolutely clear that the plan outlined here is designed to confirm certain assumptions about conditions in the lower HSU. These assumptions should be defined prominently and explicitly in Tech Memo 8. This must be coupled

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

APR 21 11 03 AM '93

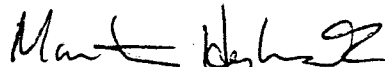
with a commitment to develop and execute contingency actions should conditions diverge from those assumed. This plan should be under development, and must be completed as soon as possible to facilitate prompt action if deviations are detected. Within Tech Memo 8, it must be clearly indicated when and how the contingency plan will be activated.

One final point, consideration should be given to adding one monitoring well east of wells 3487 and 2887, or justification for not doing so provided. These wells show low levels of organics in lower HSU siltstones or sandstones, which may be crossgradient from the southeast trenches. It does not appear existing wells will intercept releases from this area into the localized and thin saturated intervals.

All issues raised here, and those raised by CDH in separate correspondence, must be resolved to the satisfaction of all parties before proceeding with subsequent stages of field work and report preparation if future problems are to be avoided.

We will continue to work with Mr. Scott Grace of your staff to expeditiously resolve the concerns raised in these comments, in order that the risk assessment process can proceed. If you have questions or would like to discuss the progress of this effort, please contact Bill Fraser (EPA) at 294-1081.

Sincerely,



Martin Hestmark, EPA
Manager
Rocky Flats Project

cc: Scott Grace, DOE
Joe Schieffelin, CDH
R.L. Benedetti, EG&G